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ABSTRACT

The process of making and implementing coherent teacher personnel policies is compounded by complex interactions among Federal, State, and local agencies. On first view, it appears these interactions are what impede rational policy initiatives in the teacher personnel area. However, it is not so much the interactions as the way in which policy is typically implemented across the several levels of government that impede such initiatives. The demands of higher government agencies for strict compliance, accompanied by mandated evaluations, frequently produce consequences that are the antithesis of those the policy intends and that may result in miseducative endeavors at the local level. The local option alternative and the educative alternative to the compliance approach may yield better educational results for local schools while simultaneously achieving the larger aims of Federal and State policy efforts. The attainment of these results is more likely if operational policies for teaching personnel are kept to an essential minimum. (Author/APM)

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TEACHER PERSONNEL POLICIES

A CASE OF INAPPROPRIATE MEANS TO APPROPRIATE ENDS

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Abstract

The process of making and implementing coherent teacher personnel policies is compounded by complex interactions among federal, state, and local agencies. On first view, it appears these interactions are what impede rational policy initiatives in the teacher personnel area. However, it is not so much the interactions as the way in which policy is typically implemented across the several levels of government. The demands of higher governmental agencies for strict compliance, accompanied by mandated evaluations, frequently produce consequences which are the antithesis of those the policy intends. These unanticipated consequences may result in miseducative endeavors at the local level. There are alternatives to the compliance approach which, if tried, may yield more educative results for local schools while simultaneously achieving the larger aims of federal and state policy efforts. The attainment of these educative results is more likely if operational policies for teaching personnel are kept to an essential minimum.

The task set for me is to respond as a policy researcher to two papers, one by the Associate Commissioner of Education for the State of Minnesota (Von Valletta), the other by the Superintendent for the Cincinnati public schools (James N. Jacobs). Jacobs and Valletta were asked to discuss features of making and implementing teacher personnel policies. My charge was to read their papers, then respond by (1) identifying new forms of policy research to further illuminate the topic of teacher personnel policies, (2) propose possible alternative approaches to making and implementing teacher personnel policies, and (3) suggest new skills that policy makers and implementers may find useful in their work.

I begin with grave doubts about the success I will have in meeting all three of these charges. That I still sometimes wonder what the term "policy" means does not help me very much. Even more troublesome is my confusion over the concept of policy research. I recall the inquiries little more than a decade ago over the meaning of "evaluation research". Now, before we even have a satisfactory handle on that concept, we are already launched upon this thing called policy research. Nevertheless I believe that matters of policy are extremely important, even if I cannot always define them clearly. Thus I take my multiple charges seriously, despite doubts about how well I shall do with them.

Academic inquiries into new areas almost always make a mess of the language. We have to deal with such cumbersome phrases as "policy making and implementation" because we have no single, simple term to cover both kinds of policy activities. And because several government jurisdictions are usually involved in matters of policy, there are problems with how to refer to "higher" government agencies, meaning federal and state agencies, without implying that local agencies are "lower" than state and federal agencies. The abbreviations LEA, SEA, and FEA have come in handy as a means to avoid implications of status and prestige, but they intrude terribly on the aesthetics of print and the reader's ease. I am afraid I haven't much to offer here. I plan to use the abbreviation PMI to refer

variously to Policy Making and Implementation, and to Policy Makers and Implementers. The letter combinations LEA, SEA, and FEA will also appear now and again in this paper. I shall occasionally be so offensive as to introduce the slash mark (F/SEA) to make reference to educational agencies above the local level.

The obvious starting point is with what we mean when discussing the topic of teacher personnel policies. Valletta offers a commendable framework for this discussion. She says that teacher personnel policies are statements that guide or direct four sets of activities. They are:

1. Staff procurement - planning for the allocation of teaching positions and hiring teachers
2. Staff organization - placing, transferring, and promoting teachers
3. Staff development - the continuing training and supervision of teachers
4. Employee relations - matters of salary, benefits, communications, grievances, etc.

Given this framework, teacher personnel policies are plans, rules, or courses of action that guide or direct the procurement, organization, and development of teachers, as well as the relations between teachers and their employers. Valletta's conception of teacher personnel policies provides a tidy delineation of the territory that will be explored in this paper.

In responding to the tasks set for them, neither Valletta nor Jacobs offers us model teacher personnel policies, nor model ways to make or implement teacher personnel policies. Neither paper contains lines like, "Here are some excellent teacher personnel policies," or "Here are ways to make teacher personnel policies work." Instead, both devote the greater parts of their papers to discussions of factors that impinge on the making and implementing of teacher personnel policies. The factors they discuss turn out to be mostly impediments to the formation of rational, coherent, and

clear personnel policies. Culling from both papers, here are the factors that appear to bear most prominently on teacher personnel policies:

-Federal legislation and agency decisions

E.g., PL 94-142, ESEA Title 1,and regulations of such agencies as the Office of Civil Rights and the Equal Employment Opportunity Commission

-State legislation and agency decisions

E.g., Ohio's Auxiliary Services Act and the regulations of Minnesota's Bureau of Teaching

-Federal and state court decisions

E.g., decisions dealing with desegregation, negligence, liability, and student rights

-Funding sources, formulae, and levels

E.g., local tax effort, state school finance decisions, soft and hard dollar funds, state aid formulae, contract and grant funds

-Teacher unions and associations

E.g., collective bargaining contracts, seniority provisions

-Community demographics

E.g., declining school enrollments, shifting racial and ethnic compositions, differences in native languages of the students

-Community values

E.g., decisive in such matters as tax support, curricular content, and attitudes towards teachers

-Demographics of the teaching profession

E.g., teacher supply and demand, availability of specially trained teachers, the increasing age of currently employed teachers

Valletta and Jacobs do not state directly, but imply that these eight factors must be accounted for in any discussion of teacher personnel policies. But neither writer is very specific about <u>how</u> these factors must or should be accounted for. Valletta recommends that LEAs get busy putting together a comprehensive set of teacher personnel policies, rather than the patch-work effort that now characterizes many local districts. Too many districts,

she argues, write policies to cover distressing situations after they arise, then wait until the next problem occurs before considering another policy adoption. Jacobs is less inclusive in his call for change, limiting himself to a plea for consistency among the many different policies promulgated at federal, state, and local levels. Jacobs writes as an executive caught in a morass of conflicting rules and regulations; his paper would serve admirably as the basis for a short story by Dostoievsky or Kafka.

I believe it will be revealing to ponder why these two writers chose to approach their assignments as they did. Representing a state education agency, Valletta makes frequent reference to the activities of large scale planning and the provision of technical assistance. She seems to envision her department, not as an enforcer of regulations or stern guardian of the "public's" interest in its schools, but as a prodder to good work and a helper in the doing of good deeds (a position I believe is closer to the appropriate stance than the role of enforcer or stern guardian). Occasional comments by Valetta indicate that she views clear, comprehensive policies as an important means for the avoidance of conflict, as a facilitator of smooth functioning and effective operation (a view with which I am not in full agreement, as will become clear later).

In contrast, my reading of Jacobs leads me to see him as a beleaguered ship's captain, at sea in the midst of constant battle, wishing devoutly that the bureaucrats back home would stop writing policies and regulations which, if followed to the letter, would compel him to rear his ship up on its stern and sail it backwards directly to the ocean depths. As a consequence, I sense that Jacobs has put some psychological distance between himself and those who promulgate state and federal policy. In order to survive, to stay sane, he has had to become somewhat detached from many of the forces that influence teacher personnel policies. In so saying, I do not wish to imply that he does not take it all seriously enough. But he seems unlikely to take it so seriously that he will have to surrender at sea because those on land cannot tell a gob from a gunnel.

In the distinct positions of these two officials rest the seeds of conflict. Valletta calls for comprehensive policies in order to direct action and avoid problems; Jacobs indicates that the current overlap in state, federal, and local policies misdirects executive action and causes problems. This apparent paradox looks as if it is resolved by noting that Valletta calls for comprehensive local policies, while Jacobs asks for more careful and consistent formulation of state and federal policies. However note the consequence of doing one and not the other: Local districts that write more comprehensive policies are likely to come into conflict with uncoordinated and ill considered state and federal policies. More thoroughly coordinated and carefully considered state and federal policies seem certain to usurp the autonomy of local districts to write their own comprehensive policies. As both writers contend (though Jacobs more strongly than Valletta), it is the interactions among the several levels of government that produce many of the problems currently associated with teacher personnel PMI (Policy Making and Implementation).

To raise the matter of interactions among different levels of government is invariably to raise issues of power, authority, and responsibility. For example, in calling upon local districts to write their own comprehensive personnel policies, Valletta implies that local districts have control over their own affairs, and should promptly assume the responsibility that accompanies this authority. Jacobs, in calling on F/SEAs for more coordination and consistency, gives the impression that these matters are beyond his (and his district's) control. Given that Jacobs perceives these matters beyond his control, it would not be surprising if we were to find that he assumes no responsibility for them. Valletta is calling for action that Jacobs implies he is powerless to effect; Jacobs calls for action that Valletta implies has little to do with the problems. One says to the other, "Look out after your own destiny," while the other replies, "Given the conditions you set, my destiny is no longer under my control."

The conditions giving rise to this seeming impasse are not easily accounted for. The growth of urban centers, the bureaucratization of organizations, the great preference shown for the pragmatic values of efficiency and effectiveness, the continuing shifts of power to higher governmental jurisdictions and the onset of citizen alienation that accompanies these shifts, ever-diversifying societal demands on schools, and changes in the nation's response to differences in human color, creed, language, and capacity have all had their effects on the way schools are run in the United States. In among these changes is a current trend that explains several of the problems mentioned by Jacobs and Valletta. This trend consists of the increasingly serious commitment of the federal government to the cause of social justice, conjoined with the increasing forcefulness of state governments in their pursuit of full accountability. I do not know why this society has become simultaneously consumed with social justice and accountability, nor do I feel I have a very clear grasp of the connection between them (if there is a connection). But both phenomena are upon us, and have had the effect of distorting quite terribly the traditional divisions of power and responsibility among the several levels of government involved with formal education.

The challenge contained in this tangled and conflicting state of affairs is how to translate the social justice imperatives of FEAs and the accountability imperatives of SEAs into local district policies in a way that neither usurps a reasonable and proper degree of local autonomy nor makes a shambles of effective management and administration at the local level. To meet this challenge we have to confront this question: Are the learning opportunities and educational attainments of students diminished, unaffected, or improved in the course of using the schools as instruments in the federal effort for social justice and the states' efforts for full accountability? There are a host of complex issues at stake, with complex interactions among the possible solutions. It takes a fool or a person of great wisdom to venture into this territory with only a few pages of prose at his or her disposal. I am about to become a fool.

I wish to argue that higher governmental jurisdictions have been given or have assumed power much faster than they have acquired understanding of the best ways to use the power they have. As a consequence, these higher jurisdictions adopted as their model for PMI mechanisms already in use, mechanisms heretofore used only in areas where the government was acting as sovereign. For example, in matters of foreign policy and national defense the federal government possesses sovereign powers; it is the government of initial jurisdiction in these matters, and acts with ultimate authority. Typically, in areas where a government is sovereign, it quite reasonably expects compliance with its directives, conducts stern investigations to insure compliance, and imposes dire consequences in cases of willful non-compliance. (The recent flap over ex-Secretary of State Ramsey Clark conferring with the ruling regime in Iran is a demonstration of the federal government's claim to sovereignty in foreign policy matters.) The PMI model used in areas where the government acts as sovereign might be called the compliance-evaluation-consequences model.

As matters of education are considered to have been reserved to the several states by the tenth amendment, the federal government is not considered sovereign in the area of education. Yet about the time that Lyndon Johnson's vision of the Great Society became manifest with such legislation as the Elementary and Secondary Education Act (ESEA), the federal government found itself with power and responsibility for educational matters not unlike the power and responsibility it exercises when acting as a sovereign power. Federal education agencies seem to have adopted the same model for PMI as the one in use in areas where the government is sovereign, the compliance-evaluation-consequences model. A similar situation ocurred in the several states. Nearly all states, as their constitutions show, presume that the power and responsibility for educational matters is indeed reserved to them. However, most states (Hawaii being the most prominent exception) further reserved this authority to their several localities. At some time in the 1950s and early '60s, this reservation was gradually withdrawn. As the states and federal government became increasingly prominent and influential in educational matters, both began and continue to exercise their powers on the compliance-evaluation-consequences model of PMI.

There are grave difficulties associated with the use of the compliance-evaluation-consequences model in matters of educational policy making and implementation. One of the most obvious is the extreme difficulty of getting people to do what you believe it is right for them to do simply by telling them that they must do it, or else. When compliance is effected with this procedure, it often carries with it resentment, strict interpretation of the letter but not the spirit of the mandate, and subtle or open rebellion at the first opportunity. The pragmatic drawbacks of this model are among the least terrifying of its problems. A more profound limitation was expressed by John Stuart Mill in his essay on Representative Government: "One of the benefits of freedom is that under it the ruler cannot pass by the people's minds, and amend their affairs without amending them" (Everyman edition, 1951, p. 277). Demands for compliance, accompanied by threats of dire consequences, are a way of amending the affairs of the people without amending their minds. The compliance-evaluation-consequences model of PMI limits severely the freedom of educational agents--a permissable upshot in cases where the people have given their government the power to act as sovereign, but a heinous breach of democratic principles in cases where sovereign authority is absent.

Because there are pragmatic and principled difficulties with the compliance-evaluation-consequences model of PMI, I believe we should search for alternative models. One oft ballyhooed alternative is to remove the government completely from areas in which it is not clearly sovereign. One sees this position articulated in what is frequently called the conservative political platform, and a variation of this position is also found in the libertarian political platform. The opposite extreme is usually called the liberal political platform. The political debates that follow from these several divisions depend for the clarity of their differences on arguing whether the government should be involved, not how the government might be involved so that worth is maximized and wrong is minimized. Surely the issue of whether different governmental jurisdictions ought to be involved in the people's affairs hinges on how they are involved, relative to those principles that stipulate what the point of purpose of our mutual endeavors are. Thus it is not

my intention to become embroiled in debate characteristic of political parties, but rather to consider different forms of governmental involvement in the PMI affairs of education. I do this partly for what I hope is the good reason just given, and partly in the more general belief that education is indeed an affair of all levels of government, and that the federal interest in social justice and the states' interests in accountability are not misplaced. That is, the commitment of higher governmental jurisdictions to social justice and accountability are indeed proper commitments; these commitments express appropriate ends. It is in the pursuit of these commitments that higher governmental jurisdictions err; inappropriate means are employed to gain appropriate ends. And in this case, the ends do not justify the means, for the means used have not and probably will not succeed in attaining the appropriate ends.

One alternative to the compliance-evaluation-consequences model is currently receiving a small trial run in the area of community and social services. It is called local option. Here higher governmental jurisdictions decentralize or down-shift policy making authority to local levels. The higher governmental agency sets general guidelines for what it wishes to accomplish, then leaves it to the locality to write and implement policy designed to accomplish the intended ends. Unfortunately, local option is being tried not because it is thought to be bona fide alternative to the compliance-evaluation-consequences approach, but because so many social services programs are such a shambles that local option seemed to be the only way to correct the problems. It is not unreasonable to suppose that if the problems are corrected, the local option alternative may be withdrawn. A second feature of local option makes one chary of the good intentions of those who proposed it; in Virginia, for example, the Commonwealth of Virginia must approve a locality's plan for local option operation. Such approval seems to rest upon the receipt of plans which indicate the locality is complying with the interest of the Commonwealth. Not exactly a far throw from the PMI model that local option presumably replaces!

Another, more far reaching and profound alternative to the PMI processes of higher governmental jurisdictions is to change our view of the nature of power and authority vested in these jurisdictions. Where the point of federal and state action is to alter decisions and conduct at local agency levels (as it most often is in educational matters), the task of F/SEAs would be viewed as primarily educative. That is, F/SEAs would serve as agencies designed to argue the case for federal and state interests. Their success in this endeavor would depend, to paraphrase Mill, on their ability to amend the people's minds as a means to amending their affairs.

In proposing this alternative, I see a difference between the work of the Federal Communications Commission or the Federal Aviation Agency, for example, and the work of federal education agencies. Radio waves and airplanes go nearly everywhere, and if centrally unregulated, they collide with one another. The result is incoherent reception or loss of life. I understand the regulation of education to be fundamentally different in kind from the regulation of air waves and air space. Formal education takes place at separate and discrete locations. Local regulation typically does not produce chaos, nor endanger life or property.

Before the further elaboration of this alternative leads the reader to conclude that I am some sort of antediluvian reactionary, I wish to make a clear place for Constitutional interests. The policy alternative suggested here would not permit the de jure segregation of public schools, nor would it permit public funds to be used to establish religion. However, to be frank, it may permit (but not necessarily encourage or condone) classroom instruction exclusively in English or the complete separation of severely handicapped children. In the case of the present alternative, if multi-lingual instruction or mainstreaming were believed to be in the federal and state interest, it would be the responsibility of F/SEAs to argue their positions with LEAs--to amend the minds of local authorities so that these authorities might then amend their affairs.

Philosophical, sociological, and economic arguments are available to support the policy alternative presently under discussion (of course, good arguments against this policy alternative are also available--though I obviously do not find them as compelling). Rather than broach these disciplinary arguments, I prefer to consider an educational argument for what might be called the educative alternative to the compliance-evaluation-consequences model of PMI. It is possible to govern schooling in a manner that is itself educative for those who are participants to this governance. In other words, it is possible to use educative means to gain educative ends. By 'education', I mean something quite distinctive: Education is the provision of means to fellow human beings which enable them to structure their experience in ways that continually enlarge their knowledge and understanding, their sense of place in the past, present, and future of the human race, and their capacity to act morally and virtuously. Policies that express worthwhile ends can be occasions for enabling persons to structure their experience in these beneficial ways, provided that those who implement the policies engage those at whom the policies are aimed in an educationally appropriate manner. Educative engagement of the kind proposed here is radically different from the kind of engagement demanded by the compliance-evaluation-consequences approach to PMI. The compliance-evaluation-consequences model for PMI usually constitutes educational mistreatment of educators.

Earlier in this paper a question was raised concerning the nature of the relation between F/SEA imperatives for social justice and accountability, and the potential of LEAs to enhance the learning opportunities and educational attainments of students. Although this question raises what appears to be a critical issue in contemporary educational policy studies, it should not be possible to frame this question sensibly. The reason it makes sense is because of our tendency to presuppose an equivalence between the operating policies of schools and the instructional practices of teachers. We too easily assume that if policies are incorporated into the operating regulations

of schools, they will then, by some process or another, work their way in the educational aims and instructional practices of teachers. But the achievement of something like social justice in the operating policies of schools is an accomplishment very different from achieving social justice as an educational aim and a principle of instructional performance. To put this point bluntly: That a school operates on a non-discriminatory basis does not mean that students are educationally engaged in the principles and practices of non-discrimination.

An anthropologist colleague of mine has done some instructive research on this point. She studied the impact of policies prohibiting gender stereotyping in school programs and curricula. She found that the schools she studied responded to this policy by becoming as nearly neutral as possible on matters of gender. The schools' neutrality on gender freed the student peer groups to deal with gender matters as they saw fit. The consequence was a retrenchment among the students of biased attitudes towards sex differences. This is a good example of having an impact on operating policy, without affecting the instructional exchange. The consequence was a result directly opposite that intended by the policy. I suspect that we going to see more of this kind of reverse impact in the course of implementing PL94-142. The operating policy of the school will change (the affairs of the school will be amended), but the educational outcomes will not be those intended by the law (inasmuch as few people's minds were amended by the compliance-evaluation-consequences approach used in the implementation of The Education for All the Handicapped Act).

Changes in operating policies do not necessarily result in changes of educational practice. Yet changes in operating policy are one of the very few ways school officials can respond the compliance-evaluation-consequences approach to PMI. This approach virtually demands changes in operating regulations, while leaving minds unchanged. To affect the educational practices of teachers, in educationally appropriate ways, it is necessary to change their minds. It is for this reason that

I find the educative alternative superior to the compliance-evaluation-consequences approach. The compliance approach will succeed in amending affairs, but it is a poor way to amend minds. Changes in educational aims and instructional practice should be effected (and quite likely have to be effected) by changing people's minds. Thus if policy is to influence educational aims and instructional practice, it must be implemented in an educative manner. It is vitally important that schools, in the course of their operation, not discriminate on the basis of race, sex, handicap, and other irrelevant criteria. But these are modest accomplishments when compared to bringing social justice and equality into clear view as an educational aim of the teacher and his or her students. It is to this latter task that good policies make their lasting contribution. To succeed, the policies must be implemented in a manner consistent with the educational objectives they are designed to obtain. In the short run, the educative alternative to compliance is not likely to earn high grades for efficiency and effectiveness; in the long run, it is likely to show the greatest gains. In addition, it is, unlike the compliance approach, an educationally defensible means for achieving educationally worthwhile ends.

Some pages back I indicated my agreement with Valletta's conception of how to run a state department of education. She avoids the strict enforcer and stern guardian roles, choosing instead to confer personally with district superintendents, to collect evidence and marshal argument on behalf of positions she believes are proper, and to engage those with whom she works in discussion about the tasks that lie ahead. In doing these things, Valletta has opted for the educative alternative to compliance-evaluation-consequences. She seeks to amend affairs by amending minds. To the extent she is effective in her work, she succeeds in preserving a measure of freedom and initiative for local officials, and encourages their exercise of authority and responsibility.

Most local school officials of my acquaintance are likely to argue that the educative settings Valletta tries to create are far from typical of federal, state, and local district interactions. Given his paper, I would count Jacobs a member of this group. What is he to do in the midst of the chaos of inconsistency he eloquently describes? There are a few advisory implications in positions that have been advanced in this paper. For whatever value they may be to Jacobs and his counterparts, they are as follows:

1. Try to convert as many professional relationships as possible to educative interactions, acting variously as student or teacher as the occasion demands.
2. Avoid allowing your affairs to be amended unless you have changed your mind about the handling of these affairs.
3. Maintain the educational interests of your teachers and your students as your primary concern, and insist that substantive changes in policy and program demonstrate their educational value to teachers and students.
4. Ask to be shown how changes in operating policies will affect the educational aims and instructional practices within classrooms, and place little confidence in changes for which the effects cannot be reasonably hypothesized.

This advice seems at once vague and immodest. However, it has rather potent grounds. It stems from the view that an educator is one whose first commitment is to certain normative principles of education, principles that incorporate elements of rationality, creativity, autonomy, and morality. An educator is one whose sense of obligation and duty are suffused with these principles. He or she is aware that unless these principles inform their thought and action, it is absurd to expect that they will inform the thought and action of their students. In order to preserve his value to students, the educator insists on being treated in an educational manner. It is, in short, an occupational necessity for an educator to insist on being treated educationally, else he or she loses

that for which we value them most. To put this point a bit differently, an educator has a responsibility to insist on educational treatment. This responsibility is exercised when an educator speaks out against silliness, simple-mindedness, and exercises of power or authority which cannot be justified as being in the educational interests of teachers and students. In writing his paper, Jacob exercised this responsibility. My disagreement with what he has written lies only in the wish that he see less inevitability in the forces he describes, and that he react to these forces with greater moral anger than comes through in his paper.

What about Valletta's call for local districts to develop more comprehensive teacher personnel policies? Here we disagree, for I am less clear than she about what these policies would accomplish. Valletta makes reference to the anticipation of problems, the avoidance of conflict, and the clarification of expectations as values of comprehensive teacher personnel policies. Under certain conditions, these are acceptable values for operating policies. But is it not more likely that elaborate personnel policies will serve as a means for some, perhaps many, officials to avoid making decisions and assuming responsibility? Operating policies easily become rules to which administrators point while shrugging their shoulders and pleading they are powerless to do other than what the policy says. Policy of this kind frequently serves as a device for insuring consistency and encouraging coordination, which are management euphemisms for conformity, standardization, and behavior that does not rock the boat. It is agreed that in these litigious times, operating policies are an important way to protect both employer and employee. Yet in the name of the law, we often put more into operating policy than the law requires; this extra material is what our own self-interest requires. Unless teacher personnel policies are designed primarily to aim educational and instructional endeavors, such policies ought to be governed by maxims of parsimony and restraint. Develop only those operating policies for teachers as are demonstrably essential, and exercise restraint when considering additions to this essential policy. Operating policies always have unintended consequences, and the

larger the system in which they operate, the less well their advocates will succeed in anticipating these consequences. Failure to correctly anticipate the consequences of policy can lead to effects quite opposite to those intended by the adoption of the policy.

If I have succeeded in framing these several points clearly, it will not be difficult to understand the reasons for recommending the maxims of parsimony and restraint. The leader of an educational setting is always trying to maximize the freedom, power, and responsibility of the participants. In the course of exercising their freedom, power, and responsibility, participants are given the opportunity to test ideas, practice beliefs and convictions, and learn from their efforts. While the participants are so engaged, the leader guides, appraises, interprets, criticizes, commends, and explains the participants' endeavors, with the intention of enabling the participants to structure the experience they are gaining from their activities. With the leader's help, the participants structure their experience by defining it, classifying it, generalizing it, relating it to associated phenomena, judging it on the basis of evidence and principles, and all the other things we do as we try to make sense of and gain a measure of control over our circumstances. Comprehensive operating policies intrude on this setting by restricting the exercise of freedom, power, and responsibility. Indeed this is precisely the point of policy, for the making of it is a sensible endeavor only when there are choices available to us (we have no policy for the weather because we cannot choose it). Hence the point of policy is to restrict the choices available to those who act under its direction. For this reason, an educational leader is especially cautious of policy, as he or she realizes that it diminishes the educative potential of educational settings. Granted, some restriction of choices may be necessary to create a reasonably coherent and acceptably predictable environment. However, the line between essential policy and excessive policy is faint, and easily breached. The consequence of excess policy is alienation and a sense of powerlessness on the part of participants. When these debilitating sentiments appear, the participants are in poor condition to serve as leaders for other participants.

One might infer from this position on comprehensive teacher personnel policies that the argument offered here opposes most forms of intervention into education through the policy process. It would be an error to draw this inference. Policy that aims educators towards instructional activities that are educative are to be regarded highly. What has been lamented in this paper is that the manner of implementing such policies is not consistent with the ends these policies are designed to achieve. And it is contended that this inappropriate manner of implementation accounts for some of the untoward effects of well-intentioned policy initiatives. Among the more noteworthy accomplishments of many recent federal and state policy efforts is that they are bona fide attempts to call educators' attention to educationally appropriate ends. As an aside to this point, I am puzzled by the perception that it seems the higher the political jurisdiction initiating the policy, the more noble (generally) the ends sought. Local school districts, in fact, localities in general, have not shown much initiative in the struggle for a human community of grand proportions. In contrast, many states and the federal government have taken an almost painful reformist stand on the profound issues of our time. Clean air, clean water, safe foods, enlightened consumers, decent housing, a better life for the aged, improved medical care, equality in race and sex, these and other aims have preoccupied higher governmental jurisdictions, while localities have simply responded without originating. What sets of forces lead higher governmental agencies to attack these issues with such vigor while localities strive so hard merely to complete daily business?

There are many factors to be dealt with in trying to answer this question. They range all the way from the simple point that higher authorities employ full time professionals to come to grips with the larger issues of life in a democracy, to more complicated matters of taxing authority and constitutional powers. Despite the enormous range of variables that must figure in any good answer to the question, it is not unreasonable to suppose that the means F/SEAs use to attain policy

goals explains a small part of the situation. Local agencies often find themselves so preoccupied with compliance and mandated evaluations that they have little opportunity to contemplate their own unique contribution to the amelioration of human affairs. (Jacobs' comment is illustrative: "Over the years we have had to develop a specialized staff with the skills to deal with government bureaucracies, both federal and state, especially in terms of getting clarification on the guidelines" p. 7.) Coping with the compliance-evaluation-consequences devices for implementing state and federal policies does more than consume time; it compromises creativity and initiative, and it restricts freedom, power, and responsibility. It is speculative of me to suggest that currently used mechanisms for policy implementation have resulted in the loss of local originality and initiative, but it is defensible to contend that these mechanisms have diminished a local district's opportunity to ponder, create, and test their own educative aims and intentions.

Returning to a point with which this paper began, the challenge to education is to conceive of a way to translate federal and state policy initiatives into purposes and practices supportive of the educational endeavors of local districts. Many state and federal programs are of great value, and their aims essential to the betterment of the nation. Still, we are faced with how to translate these aims in ways that preserve the point and purpose of education. I have argued that higher governmental jurisdictions have a far clearer grasp of what it is our schools should do than they have of how they can function to accomplish these ends. Local districts have done little to alter this situation, inasmuch as they have acceded to the compliance-evaluation-consequences approach to implementation, and amended their affairs without amending their minds. As such, they must assume as much a share of responsibility for the harvest they reap as higher governmental agencies for the seeds they sow. We, as educators, would be greatly advantaged if we were more

clear headed about the nature and purpose of education. Our response to policy making and implementation could be markedly improved if we acknowledged the fundamental and profound reasons for undertaking the education of each new generation. Noble ends require educative means if they are to be realized through education. It may be possible to attain these great ends by miseducative means, but it is unlikely that this attainment will ever occur within a system of education.

Assessing the extent to which I have responded to the three charges set for me seems a good way to summarize the major points of this paper. The first charge was to identify new forms of policy research to further illuminate the topic of teacher personnel policies. No new forms of policy research were identified. The positions developed in this paper imply that we continue with some of the old forms, particularly that form which investigates the consequences of federal and state policies on local aims and practices. The work of Arthur Wise (see his recent book, Legislated Learning, University of California Press, 1979) is a good example of this form of inquiry. We should continue to improve our understanding of the relations among federal, state, and local agencies, and to assess the consequences for local districts of large-scale state and federal policy initiatives.

Perhaps there is one new form of policy research suggested by the argument, although it will not be perceived as new by educational theorists and philosophers of education. It might be called normative analysis, wherein policies are appraised on the standard of how well they orient the thought and action of educators to educationally sound ends. Normative analysis of educational policy is a process of deciding the extent to which policy making and implementation are consistent with and productive of rationally defensible and morally justified aims and practices. Support for normative analysis would benefit PMIs by providing them with criteria to judge the appropriateness of their efforts. It would benefit local education officials by providing standards against which to evaluate the educational worth of policy directives.

The second charge was to propose alternatives to the making and implementing of policy. Two alternatives were discussed, the local option alternative and the educative alternative. These two alternatives are actually different sides of the same coin, for some form of local option is required for the educative alternative to work. Major consideration was given to the educative alternative as an approach to PMI that is superior to the compliance-evaluation-consequences approach. It was argued that in order for the goals of educational policy initiatives to become incorporated into the substantive instructional programs of schools, these policies must be implemented in an educational manner. Failing this, the policy goals will, at best, simply become absorbed into the operating policy of the school system without making their way into educational exchanges between teachers and learners.

It was hypothesized that federal and state agencies adopted the compliance-evaluation-consequences approach to PMI because it was a model with which these agencies were familiar. It was familiar because other government agencies, acting in areas where they are vested with sovereign powers, perfected this approach to meet their responsibilities as a sovereign power. Unfortunately the implementation of educational policies according to a sovereign powers model disinclines those subject to the implementation from continuing to think and act in a manner most likely to further their own education and the education of their students. The upshot is that local educators are either disadvantaged by this form of implementation, or they avoid engaging the policies in an educationally substantive manner by casting them as operating policies for the school system.

The educative approach to implementation involves treating educators in a manner identical to the manner we hope they will use when educating their students. This approach seeks to maximize the freedom, power, and responsibility of local educators, using the policy goals as a basis for guiding, interpreting, appraising, criticizing, commending, and interpreting

their efforts. The point of using this approach is to insure that the worthwhile aims of sound educational policies become as completely incorporated into instructional exchanges as possible. It also provides an occasion for the continuing education of teachers, administrators, and those who make and implement policy. As these persons deal with one another in an educative manner, they have the opportunity to practice and perfect skills that enhance their daily work as educators. They are modeling with one another conduct they mutually agree ought to characterize what takes place in the classroom.

The third charge was to suggest new skills that might prove useful to PMIs. Few skills were discussed in this paper. What was discussed were perspectives, points of view, and positions. Many of these require skills to make them operational in action. For example, it takes skill to convert routine management interactions into educational exchanges. It requires skill to exercise restraint on the adoption of new operating policies, and skill to convince others of the wisdom of parsimony. Skill is also required to assess educational policies on the basis of their substantive worth for enhancing what takes place in the classroom. However, skills were obviously not the focal point of this paper. Its purpose was to encourage local education officials to concern themselves with educationally worthwhile endeavors, and to encourage state and federal officials to conceive of their work as educative of those they serve. Along the way, I hoped for some success in showing that what is educational about schooling is not found in the operating policies of school systems, but in the instructional exchanges taking place in school classrooms. Whatever advice to PMIs may be in this paper, it can be summarized thus: People who try to alter your affairs without changing your mind are probably not interested in your education, or, for that matter, in anybody's education; taking such people seriously may be hazardous to your value as an educator.